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January 14, 2025

VIA ECF

The Honorable Margaret M. Garnett
 U.S. District Court for the Southern District of New York
 Thurgood Marshal U.S. Courthouse
 40 Foley Square, Courtroom 906, New York, NY 10007

Re: *Vanguard Logistics Services (USA), Inc., et al. v. Beemac, Inc., et al.*
Case No. 1:24-cv-08527

Dear Judge Garnett:

This firm represents Defendants Beemac, Inc. and Beemac Logistics, LLC (collectively, the “Beemac Defendants”) in the above-referenced action. We write pursuant to Rule I(B)(5) of Your Honor’s Individual Rules to respectfully request an adjournment of the initial pretrial conference scheduled for January 23, 2025 and the January 16, 2025 deadline to file a joint letter and a proposed civil case management plan and scheduling order (collectively, the “Joint Letter and Proposed Plan”).

The reason for this request is that the Beemac Defendants filed a motion to dismiss for lack of personal jurisdiction, improper venue, and failure to state a claim on January 13, 2025 (ECF Nos. 21, 22). Given that this motion implicates the Court’s jurisdiction and venue, the Beemac Defendants respectfully request a postponement of the initial pretrial conference and the Joint Filing to a date after the Court rules on the Beemac Defendants’ Motion to Dismiss. If the Court were to grant the Beemac Defendants’ Motion, no pretrial conference in this action would be necessary.

The Beemac Defendants also note that Plaintiffs filed an affidavit of service, reflecting that Defendant GoldenWheels, Inc., which this firm does not represent, was served on December 13, 2024 and its answer or responsive pleading was due on January 3, 2025. GoldenWheels, Inc. has yet to respond to the Complaint or otherwise appear in this action, and it appears that Plaintiffs have yet to serve Defendant Ranjodh Singh. The Beemac Defendants respectfully

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submit that it would be most productive to have a pretrial conference after all of the named parties have been served and appeared in this action.

This is the Beemac Defendants' first request for an adjournment of the initial pretrial conference and the deadline to file the Joint Letter. This request is made in good faith and not to cause undue delay. If granted, this request will not impact any other scheduled dates.

We have conferred with Plaintiffs' counsel, and Plaintiffs do not consent to the relief requested.

We thank the Court for its time and attention to this matter.

GRANTED. The Initial Pretrial Conference and the accompanying deadline for the parties' joint submissions are hereby ADJOURNED *sine die* pending the Court's resolution of the pending motion to dismiss.

SO ORDERED. Dated January 15, 2025.



HON. MARGARET M. GARNETT
UNITED STATES DISTRICT JUDGE

Respectfully Submitted,

/s/ Y. Katie Wang

Y. Katie Wang